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7 *Rainbow Canyon Retreat ("Fresh Start")*

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9 UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF NEVADA

11 HARRY GEANACOPULOS, a Massachusetts
Citizen; LAREN GEANACOPULOS, a
12 Massachusetts Citizen; and, PETER
GEANACOPULOS, a Massachusetts Citizen

13 Plaintiffs,

14 vs.

15 NARCONON FRESH START d/b/a
16 RAINBOW CANYON RETREAT;
ASSOCIATION FOR BETTER LIVING
17 AND EDUCATION INTERNATIONAL;
NARCONON INTERNATIONAL; and,
18 DOES 1-100, ROE Corporations I-X, inclusive,

19 Defendants.

CASE NO. 2:14-cv-00629-JCM-NJK

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH
LR 26-1(e)**

20 The parties, through their counsel, submit the following Stipulated Discovery Plan and
21 Scheduling Order pursuant to the requirements of F.R.C.P. 26, F.R.C.P. 16(b) and LR 26-1.

22 **F.R.C.P. 26(f) Conference**

23 Pursuant to F.R.C.P. 26(f) and LR 26-1(d), a conference was held on July 25, 2014, between
24 Plaintiffs' counsel, Ryan Hamilton of Hamilton Law; Fresh Start's counsel, Alayne Opie of Lewis
25 Brisbois Bisgaard & Smith; and, Narconon International's ("NI") and Association for Better Living
26 and Education International's ("ABLE") counsel, John Bemis of Hall Prangle & Schoonveld, LLC.

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Discovery Cut-Off Date (LR 26-1(e)(1))

The proposed last day of discovery shall be January 2, 2015, which is approximately 180 days from the date (July 7, 2014) on which NI and ABLE filed its Motion to Dismiss Complaint (Doc. 13).

Amendment of Pleadings and Adding of Parties (LR 26-1(e)(2))

The parties shall have until October 3, 2014, to file any motion to amend the pleadings or to add parties. This date is approximately 90 days prior to the close of discovery.

F.R.C.P. 26(a)(2) Disclosures (Experts) (LR 26-1(e)(3))

Disclosure of experts shall proceed according to F.R.C.P. 26(a)(2), except that, pursuant to LR 26-1(e)(3):

(A) Parties shall disclose their initial experts and expert reports by November 3, 2014, which is approximately 60 days prior to the close of discovery; and

(B) Parties shall disclose their rebuttal experts and expert reports by December 3, 2014, which is approximately 30 days after the parties' initial disclosure of experts.

Dispositive Motions (LR 26-1(e)(4))

The parties shall have until January 30, 2015, to file dispositive motions, which does not exceed 30 days after the proposed discovery cut-off date.

Joint Pretrial Order (LR 26-1(e)(5))

The joint pretrial order shall be filed by February 27, 2015, which is not more than 30 days after the date set for filing dispositive motions. If a dispositive motion is timely filed, this deadline is suspended until 30 days after decision of the dispositive motions, or until further order of the Court.

F.R.C.P. 26(a)(3) Disclosures (LR 26-1(e)(6))

Unless otherwise directed by the Court, pretrial disclosures as set out in F.R.C.P. 26(a)(3) shall be made at least 30 days before trial. Within 14 days thereafter, unless a different time is specified by the Court, a party may serve and file a list disclosing objections as set out in F.R.C.P. 26(a)(3).

Interim Status Report (LR 26-3)

The parties' Interim Status Report is due on November 3, 2014, which is not later than 60 days before the discovery cut-off.

1 **Initial Disclosures**

2 The parties shall serve their initial disclosures, as required by F.R.C.P. 26(a)(1), by August 8,
3 2014.

4 **Discovery Plan**

5 The parties jointly propose to the Court the following discovery plan: all discovery allowed
6 under the Federal and Local Rules of Civil Procedure. The parties intend to take discovery regarding
7 liability and damages.

8 **Pre-Trial Conference**

9 The parties do not request a pre-trial conference with the Court before the entry of the
10 Scheduling Order.

11 **Settlement**

12 To be determined.

13 **Pretrial Disclosures**

14 Final lists of witnesses and exhibits required by F.R.C.P. 26(a)(3) shall be included in the joint
15 pretrial order. The parties shall have 14 days after service of final lists of witnesses and exhibits to file
16 objections under F.R.C.P. 26(a)(3).

17 **Later Appearing Parties**

18 A copy of this Discovery Plan and Scheduling Order shall be served within five days of an
19 appearance by any new party. This Discovery Plan and Scheduling Order shall apply to such later-
20 appearing parties, however the parties herein agree to stipulate to extend discovery deadlines should
21 there be good cause to do so if additional parties are added hereafter.

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Extensions or Modifications of the Discovery Plan and Scheduling Order

LR 26-4 governs modifications or extensions of this Discovery Plan and Scheduling Order. Any stipulation or motion must be made no later than 21 days prior to the expiration of the subject deadline.

DATED this 28th day of July, 2014

LEWIS BRISBOIS BISGAARD & SMITH LLP

By /s/ Alayne M. Opie

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Rainbow Canyon Retreat ("Fresh Start")*

DATED this 28th day of July, 2014

HAMILTON LAW

By /s/ Ryan A. Hamilton

Ryan A. Hamilton

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Attorneys for Plaintiffs

1 DATED this 28th day of July, 2014

2 HALL PRANGLE & SCHOONVELD, LLC

3
4 By /s/ John Bemis

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7 John F. Bemis

8 Nevada Bar No. 9509

9 1160 North Town Center Drive, Suite 200

10 Las Vegas, Nevada 89144

11 *Attorneys for Association for Better Living and Education*
12 *International ("ABLE") and Narconon International*
13 *("NI")*

14 IT IS SO ORDERED:

15 UNITED STATES MAGISTRATE JUDGE
16 DATED: